

HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KURT A. BENSHOOF, A.R.W. by and  
through his father, KURT A. BENSHOOF,  
BRETT FOUNTAIN, URVE MAGGITT,  
Plaintiffs,

v.

ANDREA CHIN, ANTHONY BELGARD,  
DONOVAN BROUSSARD, NATHAN  
CLIBER, CATHERINE CORNWALL,  
GREGG CURTIS, JANE DOE, JENNY  
DURKAN, JOHN DUUS, NICHOLAS  
EVANS, PASCAL HERZER, RYAN ELLIS,  
MICHAEL FOX, TYLER GOSLIN, JULIE  
KLINE, ERNEST JENSEN, JONATHAN  
KIEHN, SPENCER KURZ, MAGALIE  
LERMAN, RICHARD LIMA, ADAM  
LOSLEBEN, YVES LUC, SARAH  
MACDONALD, JACOB MASTERSON,  
GRANT MAYER, STEVEN MITCHELL,  
JOHNATHAN MUSSEAU, BREHON NESS,  
LILIYA NESTERUK, STEPHEN  
OKRUHLICA, KATRINA OUTLAND,  
JESSICA OWEN, SARAH PENDLETON,  
DWAYNE PIRAK, BRIAN REES, BLAIR  
RUSS, JULIE SALLE, DANIEL  
SCHILLING, TY SELFRIDGE, NATHAN  
SHOPAY, STEVEN STONE, MICHAEL  
TRACY, MELANIE TRATNIK, SARAH  
TURNER, TREVOR TYLER, MICHAEL  
VIRGILIO, ANDREW WEST, CHAD  
ZENTNER, in their individual capacities,  
CITY OF SEATTLE, KING COUNTY,  
Defendants.

NO. 2:24-cv-00808-JHC

DECLARATION OF BLAIR RUSS IN  
SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFFS' MOTION  
TO DISQUALIFY

NOTE ON MOTION CALENDAR:

APRIL 7, 2025

1 I, Blair Russ, declare under penalty of perjury pursuant to the laws of the United States  
2 and the State of Washington, as follows:

3 1. I am over the age of 18 and am competent to testify to the facts stated in this  
4 declaration. I have personal knowledge of the facts set forth in this declaration, and could testify  
5 competently to them if called upon to do so.

6 2. I am a civil attorney based in Seattle, Washington. I have represented  
7 Jessica Owen in multiple lawsuits and appeals involving Plaintiff Kurt Benshoof. Mr. Benshoof  
8 has sued me personally in multiple lawsuits in this district due to my representation of  
9 Ms. Owen.

10 3. I am aware of the potential conflicts inherit in my and Nathan Cliber's joint  
11 representation by Michael Tracy and Sarah Turner, including that they have been named as  
12 defendants in this lawsuit, and understand and have consented to their joint representation.

13 4. I retained Mr. Tracy and Ms. Turner in the present lawsuit, in part, because of the  
14 now years of experience they have gained in responding to and dismissing Mr. Benshoof's  
15 baseless claims and abusive litigation tactics, and I would be severely prejudiced if the Court  
16 were to grant Plaintiffs' Motion and force me to retain new counsel.

17 5. I believe that my, Mr. Cliber's, and Mr. Tracy and Ms. Turner's interests in  
18 defending against and dismissing Mr. Benshoof's meritless claims are aligned.

19 I declare under penalty of perjury under the laws of the United States of America and the  
20 State of Washington that the foregoing is true and correct.

21 Signed on this 1st day of April, 2025, at Seattle, King County, Washington.

22  
23  
24 s/ Blair Russ  
Blair Russ

**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the United States and the State of Washington that on April 1, 2025, the foregoing document was served upon the following parties in the manner indicated below:

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Attorneys for Defendant City of Seattle

Dated: April 1, 2025

s/ Marry Marze  
Marry Marze, Legal Assistant